

Joseph A. Grube, OSB #962976
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Grube Orehoski, PLLC
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Seattle, WA 98101
Tel: 206.624.5975/ Fax: 206.770.7607
Attorneys for Plaintiff

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON
EUGENE DIVISION**

KIMBERLY TRENT,

Plaintiff,

Defendant.

CASE NO. 6:17-cv-01906-MC

PLAINTIFF'S WITNESS STATEMENTS

Plaintiff Kimberly Trent, by and through her attorneys Joseph Grube and Karen Orehoski, submit the following Lay Witness Statements and Expert Witness Statements.

1. Kimberly Trent (2 hours for direct examination)

Kimberly Trent is the plaintiff in this case and is expected to testify consistent with her deposition testimony. She will testify that she was slowing down in traffic on I-5 when she was rear ended by the vehicle driven by Defendant. She will testify about the forces of the crash on her body. She is expected to testify about the injuries she sustained to her brain, head, neck and shoulder, the medical and neuropsychological treatment she received, her inability to work and the income loss she has sustained as a result of the crash. She will

PLAINTIFF'S WITNESS STATEMENTS

1 testify that prior to the crash she was functioning at a high level at work and was not
2 experiencing cognitive disability.
3

4 She is expected to testify about the pain and suffering, emotional distress, and
5 disability she has suffered as a result of the Defendant's negligence, including the emotional
6 and financial strain her disabilities have put on herself and her family.

7 **2. Anne Marie Trent (1 hour for direct examination)**

8 Anne Marie Trent is Ms. Trent's daughter. She was in the same vehicle as her
9 mother when it was struck by the Defendant's vehicle. She is expected to testify about the
10 forces of the crash she personally experienced, and her observations of those forces on her
11 mother's body. She is expected to testify that her mother's head snapped backwards into the
12 headrest and then moved forward hitting the steering wheel during the collision. She is
13 expected to testify about her observations of her mother's physical, mental, and
14 psychological condition, and the detrimental changes she has seen in her mother following
15 the crash. She is expected to testify that her mother has exhibited drastic personality and
16 cognitive behavioral changes since the collision.
17

18 **3. Rachel Halley (1 hour for direct examination)**

19 Rachel Halley is a schoolteacher in Richland Washington. She is Ms. Trent's
20 lifelong friend. She was in a different vehicle on the same exit ramp when the crash
21 occurred. She is expected to testify that she heard the crash. She is expected to testify to her
22 observations at the accident scene, including her observations of Ms. Trent and the
23 Defendant.
24

25 Ms. Halley is expected to testify to her observations of Ms. Trent's physical, mental,
26 and psychological condition, and the detrimental changes she has seen in her friend

1 following the crash. She is expected to testify that her friend has exhibited drastic physical
2 personality and cognitive behavioral changes since the collision. She is expected to testify
3 about the ways in which she helps Ms. Trent perform routine tasks of daily living because
4 she is now unable to do those things for herself.

5 **4. Janice Ford (1 hour for direct examination)**

6 Janice Ford the Ms. Trent's mother. She is expected to testify about her observations
7 of her daughter's physical, mental, and psychological condition, and the detrimental changes
8 she has seen in her daughter following the crash. She is expected to testify that her daughter
9 has exhibited drastic physical emotional, personality and cognitive behavioral changes since
10 the collision. She is expected to testify about the ways in which she helps Ms. Trent perform
11 routine tasks of daily living because Ms. Trent is now unable to do those things for herself.

13 **5. Jessica Knigge (45 minutes for direct examination)**

14 Jessica Knigge is a WTP Project Document Control Supervisor for Bechtel
15 Corporation, Ms. Trent's former employer.¹ Ms. Knigge will be testifying using
16 contemporaneous remote communication.

18 Ms. Knigge was Ms. Trent's supervisor at the time of the crash. She is expected to
19 testify about the job requirements as a document control specialist (Ms. Trent's job) for the
20 Hanford waste treatment project, including its demand for attention to detail and high
21 functioning cognitive skills. She is expected to testify that prior to the crash Ms. Trent
22 consistently met or exceeded expectations, was never disciplined, and was a good employee.
23 She is expected to testify that Ms. Trent was consistently promoted within the company, and
24 was a substantial contributing member to her team, as well as the overall organization,
25

26 ¹ The WTP is the Hanford Waste Treatment and Immobilization Plant

1 including volunteering for committees and projects. She is also expected to testify as to the
2 technical training Ms. Trent successfully completed at Bechtel, as well as her compensation
3 which was previously disclosed during discovery.

4 Ms. Knigge is expected to testify that following the collision - and following Ms.
5 Trent's initial return from her medical leave of absence - Ms. Trent struggled to perform the
6 same tasks she had previously excelled at. She required repeated retraining and was
7 ultimately not able to perform the key responsibilities of her job. She is expected to testify
8 that Ms. Trent was ultimately terminated because she had exhausted any and all possible
9 leave or accommodation the company was able to provide her.
10

11 **6. Paula Smith (30 minutes for direct examination)**

12 Paula Smith is a senior HR representative for Bechtel in Richland, Washington. Ms.
13 Smith will be testifying using contemporaneous remote communication. Ms. Smith was Ms.
14 Trent's HR supervisor during her employment at Bechtel. She is expected to testify about
15 Ms. Trent's compensation and benefits while she was employed at Bechtel. She is only
16 expected to testify should the relevance or admissibility of various documents be at issue -
17 including Plaintiff's proposed Exhibits 11 through 22 - and/or if the reason for Ms. Trent's
18 termination from Bechtel is disputed.
19

20 **7. Adam Miller (30 minutes for direct examination)**

21 Adam Miller is a trooper with the Oregon State Patrol. He was one of the troopers
22 who arrived at the scene of the collision. He is expected to testify consistent with his Oregon
23 Police Traffic Crash Report (Plaintiff's proposed Exhibit 6) as well as photographs he took
24 at the scene. Specifically, he is expected to testify about his observation of the crash scene,
25 his observations of Ms. Trent's injuries, statements made to him by the parties involved in
26

1 the crash regarding the cause of the crash and the relative location of and damage observed
2 to the vehicles.
3

4 **8. Karen Stanek, M.D., Ph.D (90 minutes for direct examination)**
5

6 Dr. Stanek is a Spokane, Washington based medical doctor licensed to practice in
7 the State of Washington. She is board certified. She is experienced in diagnosing and treating
8 traumatic brain injuries in both inpatient and outpatient settings. A copy of her CV is
9 attached.
10

11 Dr. Stanek is one of Ms. Trent's treating physicians for brain injury. Dr. Stanek is
12 expected to testify consistent with her medical records, as well as her September 25, 2022,
13 letter written in response to Defendant's retained expert's reports, which has previously been
14 disclosed. Dr. Stanek is expected to testify that Ms. Trent's brain injury and ongoing
15 symptoms were caused by the September 2016 crash. She is expected to testify to her
16 observations of Ms. Trent's symptoms and her review of Ms. Trent's medical records in the
17 ordinary course of her treatment. She is expected to testify that Ms. Trent's symptoms and
18 disability are consistent with the type of brain injury Ms. Trent suffered. She is expected to
19 testify about the reasonableness and necessity of medical treatment Ms. Trent has received to
20 date, the necessity for Ms. Trent's future treatment, medical causation, disability, and Ms.
21 Trent's prognosis for the future.

22 She is expected to rebut the disclosed opinions of Defendant's expert.
23

24 **9. Michael Turner, M.D. (1 hour for direct examination)**
25

26 Dr. Turner is a Richland, Washington based medical doctor, licensed to practice in
the State of Washington. He is board certified. Dr. Turner will be testifying using
contemporaneous remote communication. He is experienced in diagnosing and treating
27

1 traumatic brain injuries in both inpatient and outpatient settings. A copy of his CV is
2 attached.
3

4 Dr. Turner is one of Ms. Trent's treating physicians for brain injury. Dr. Turner is
5 expected to testify consistent with his medical records. Dr. Turner is expected to testify that
6 Ms. Trent's brain injury and ongoing symptoms were caused by the September 2016 crash.
7 He is expected to testify about his observations of Ms. Trent's symptoms and his review of
8 Ms. Trent's medical records in the ordinary course of his treatment. He is expected to testify
9 that Ms. Trent's symptoms and disability are consistent with the type of brain injury Ms.
10 Trent suffered. He is expected to testify about the reasonableness and necessity of medical
11 treatment Ms. Trent has received to date, the necessity for Ms. Trent's future treatment,
12 medical causation, disability, and Ms. Trent's prognosis for the future.

13 **10. Serena Williams, ARNP (30 minutes for direct examination)**

14 Advanced Nurse Practitioner Williams is a Richland, Washington Nurse
15 Practitioner, licensed to practice in the State of Washington. She will be testifying using
16 contemporaneous remote communication.
17

18 Advanced Nurse Practitioner Williams is one of Ms. Trent's treating health care
19 providers. Advanced Nurse Practitioner Williams is expected to testify consistent with her
20 medical records. She is expected to testify that Ms. Trent's brain injury and ongoing
21 symptoms were caused by the September 2016 crash. She is expected to testify about her
22 observations of Ms. Trent's symptoms and her review of Ms. Trent's medical records in the
23 ordinary course of her treatment. She is expected to testify that Ms. Trent's symptoms and
24 disability are consistent with the type of brain injury Ms. Trent suffered. She is expected to
25 testify about the reasonableness and necessity of medical treatment Ms. Trent has received to
26

1 date, the necessity for Ms. Trent's future treatment, medical causation, disability, and Ms.
2 Trent's prognosis for the future.

3 DATED this 3rd day of March 2022.

4 **GRUBE OREHOSKI, PLLC**

5 By: /s/ Joseph A. Grube
6 Joseph A. Grube OSB #962976
7 Karen Orehoski, *admitted pro hac vice*
joe@go-trial.com
karen@go-trial.com
8 Attorneys for Plaintiff Kimberly Trent

KAREN A. STANEK, M.D., Ph.D.

6317 S. DEARBORN RD

SPOKANE, WASHINGTON 99202

CURRICULUM VITAE

SUMMARY OF QUALIFICATIONS AND OBJECTIVES

SUMMARY OF QUALIFICATIONS AND OBJECTIVES

I completed my Ph.D. in Exercise Physiology in 1978 and worked in cardiovascular research for five years. I completed my Physical Medicine and Rehabilitation Residency training in June of 1992.

I became Board Certified in Physical Medicine and Rehabilitation in May of 1993. I have a strong background in cardiac rehabilitation and traumatic brain injury. My first year out of residency I worked for Comp Health, completed a one month special study in traumatic brain injury and completed a course in Business Administration and Management in Medicine at Harvard University. I then served as Medical Director of Deaconess Rehabilitation Institute in Spokane, Washington from August of 1993 until September of 1994. During this year, I served on the Integration Committee, which was instrumental in merging the rehabilitation centers from Sacred Heart Medical Center and Deaconess Rehabilitation Institute to form St. Luke's Rehabilitation Institute. I served as In-patient Medical Director of the new institute from September 7, 1994 until November 3, 1995. I started my private practice as Northwest Medical Rehabilitation, PS, in 1996 and treated patients with spinal cord injury, orthopedic/general, traumatic brain injury and/or stroke diagnosis both at St. Luke's (in-patient) and outpatient setting(my clinic).

In my clinic work I became interested in spasticity management and learned how to manage inta-rthecal baclofen pumps and use neurotoxins. This continued until I retired in 12/31/2022 from Northwest Medical Rehabilitation. I am now working part time as medical Director of Spokane Hyperbaric Center and am owner and Director of New Cell Northwest, a stem cell clinic.

EDUCATION

International ATMO, Inc
Hyperbaric Medicine
May 2006
Hyperbaric Training/Certification
414 Navarro, Ste 502
San Antonio, TX 78205

Business Administration and Management Course:
Sponsored through Harvard School of Public Health - completed May 1993
Boston, Massachusetts

Special Understudy in Traumatic Brain Injury:
Under Catherine Bontke
TIRR-1993
Houston, Texas

Board Certification:
American Board Physical Medicine and Rehabilitation: Certificate No. 4275
Physical Medicine and Rehabilitation 5/19/1993-6/30/2003
Recertified 7/1/2003-6/30/2013
Recertified 7/1/2013-12/31/2023

Residency:

Physical Medicine and Rehabilitation - July 1989 - June 1992
University of Colorado Health Sciences Center
4200 E 9th Avenue, C243
Denver, Colorado 80202

Internship:

Medicine - July 1988 - June 1989
University of South Dakota
2501 W 22nd
Sioux Falls, South Dakota 57105

Doctor of Medicine-Medical School:

University of Mississippi Health Services Center
2500 N State Street
Jackson, Mississippi 3946-4505
July 1984 – May 1988

Post-Doctoral Training:

Fellowship
Physiology - June 1978 - July 1984
University of Mississippi Health Services Center
2500 N State Street
Jackson, Mississippi 3946-4505

Graduate School:

Doctorate Degree - Exercise Physiology - June 1975 - May 1978
University of Wisconsin
Madison, Wisconsin 53706

Masters Degree:

Exercise Physiology - September 1973 - May 1975
University of Wisconsin
Madison, Wisconsin 53706

College:

Bachelor of Science - September 1969 - May 1973
Phi Beta Kappa
University of Idaho
Moscow, Idaho 83843

PROFESSIONAL EXPERIENCE

Private Practice - Northwest Medical Rehabilitation, PS
February 1996 to December 31, 2022
1315 North Division, Spokane, WA 99202

Medical Advisor for Traumatic Brain Injury
St Luke's Rehabilitation Institute
June 2004 to December 2015
711 South Cowley, Suite 310, Spokane, WA 99202

Associate Professor
Pacific Northwest University of Health Sciences
2016-2022
200 University Parkway
Yakima, Wa 98901

Medical Director for
Spokane Hyperbaric Center
2006 to present
13007 East Mission
Spokane, WA 99216

Owner and Medical Director of New Cell Northwest
2019-present.

Medical Consultant for
North Idaho Advanced Care Center
2006 to 2010
600 North Cecil
Post Falls, ID 83854

Clinical Responsibilities Only
St. Luke's Rehabilitation Institute
November 1995 to 2015
711 South Cowley, Suite 310, Spokane, WA 99202

Co-Medical Director-Administrative and Clinical Responsibilities
St. Luke's Rehabilitation Institute
September 1994 to November 1995
711 South Cowley, Suite 310, Spokane, WA 99202

Medical Director-Administrative and Clinical Responsibilities
Deaconess Rehabilitation Institute
August 1993 to September 1994
711 South Cowley, Spokane, WA 99202

Locum tenens-
Clinical Responsibilities - Mediplex - Denver
8451 Pearl Street
Thornton, CO 80229

Western Hills Rehab Hospital
3 Western Hills Drive
Parkersburg, WV 26101

Mountain View Regional Rehab Hospital
1160 VanVoorhis Road
Morgantown, WV 26505

Kadlec Medical Center
888 Swift Boulevard
Richland, WA 99352

Part time work during residency training - Clinical Responsibilities
Wheat Ridge Center for the Mentally Retarded
Part-time during residency training - December 1989 - June 1992

Associate Staff - Clinical Responsibilities

Mediplex Rehabilitation Hospital - Thornton, Colorado
Part-time during residency training - January 1991 - June 1992

Associate Professor in Physiology

Department of Physiology and Biophysics - June 1982 - May 1984
University of Mississippi Health Sciences Center
Jackson, Mississippi

Appointed to Graduate Faculty

Department of Physiology and Biophysics - June 1980 - May 1984
University of Mississippi Health Sciences Center
Jackson, Mississippi

Instructor of Physiology

Department of Physiology and Biophysics - June 1979 - May 1980
University of Mississippi Health Sciences Center
Jackson, Mississippi

Project Assistant

Cardiovascular Exercise Laboratory - Summer 1975 - 1978
University of Wisconsin
Madison, Wisconsin

Teaching Assistant

Department of Physiology - September 1973 - May 1978
University of Wisconsin
Madison, Wisconsin

MEDICAL LICENSES

	Year Applied	Number	Expiration Date
Mississippi	1989	12158	6/30/17
Colorado	1990	30558	4/30/19
West Virginia	1992	17068	Expired
Utah	1992	1109310220	Expired
California	1992	A051003	Expired
Texas	1992	J3234	Expired
Washington	1993	WA30530	10/19/23
Idaho	1997	M-7211	6/30/24

ABSTRACTS PRESENTED

1. "Spasticity Management: Focus on Rehabilitation." Presented for Medtronics, February 2, 2006.
2. "The Pediatric Athlete with Disabilities." Presented at WSMA, September 115, 2006
3. "Changes in regional blood flow and cardiac output, after L-Glutamate stimulating of the A5 catecholamine cell group." Federation of American Societies of Experimental Biology Meeting, 1993.

4. "Regional blood flows and resistances in Wistar-Kyoto (WKY) and spontaneously hypertensive rats (SHR)." Federation of American Societies of Experimental Biology Meeting, 1980.
5. "A microsphere technique for flow studies in conscious rats." Federation of American Societies of Experimental Biology Meeting, 1980.
6. "Exercise metabolic effects of hyperoxia in ponies." Federation of American Societies of Experimental Biology Meeting, 1978.

HONORS

Best Doctor List Spokane - 2006 through 2008
Best Doctor List Spokane - 2011
Best Doctor List Spokane - 2015 through 2017
Best Doctor List Spokane - 2020 and 2021
Two Thousand Notable American Women - 1994
AOA Research Recipient - 1985

HONORS CONTINUED

Outstanding Young Women of America - 1985
Who's Who in Research and Technology - 1982?
Mu Epsilon Delta - Pre-Medical Society - 1972 - 1973
Phi Beta Kappa - 1972
Sigma Delta Epsilon - 1972
Phi Kappa Phi - 1971

PROFESSIONAL SOCIETIES

Member of the American Academy of Physical Medicine & Rehabilitation
Member of the American Board of Physical Medicine & Rehabilitation
Member of the American Congress of Rehabilitation Medicine
Member of the Association of Academic Physiatrists
Member of the American Medical Association
Member of the Spokane County Medical Society
Member of the Idaho State Medical Association

PUBLICATIONS

1. Smith, T.L., T.G. Coleman, K.A. Stanek and W.R. Murphy.
"Hemodynamic monitoring for 24 hours in unanesthetized rats."
American Journal of Physiology, 253:H1335-H1341, 1987.
2. Stanek, K., T.G. Coleman and W.R. Murphy.
"Overall hemodynamic pattern in coarctation of the abdominal aorta in conscious rats." Hypertension, 9:611-618, 1987.
3. Stanek, K., T.G. Coleman, T.L. Smith and W.R. Murphy.
"Two hemodynamic problems commonly associated with the microsphere technique for measuring regional blood flow in rats."
Journal of Pharmacological Methods 13:117-124, 1985
4. Budden, J., K. Stanek, W. Coltharp, M. Maher and J.W. Maher.
"Effect of "increased" intra-abdominal pressure on visceral blood flow."
American College of Surgeons Surgical Forum XXXV, P. 462-464, 1984.

5. Murphy, W.R., T.G. Coleman, T.L. Smith and K. Stanek.
"The effects of graded renal artery constriction on blood pressure, renal artery pressure and plasma renin activity in Goldblatt hypertension." *Hypertension* 6 (1) 68-74, 1984.
6. Stanek, K., J.J. Neal, W.B. Sawyer and A.D. Loewy.
"Changes in regional blood flow and cardiac output after glutamate stimulation on the A5 catecholamine cell group in the rat." *American Journal of Physiology*. 246:H44-H51, 1984.

PUBLICATIONS CONTINUED

7. Stanek, K., T.L. Smith, W.R. Murphy and T.G. Coleman.
"Hemodynamic disturbances in the rat as a function of the number of microspheres injected." *American Journal of Physiology*. 245:H920-923, 1983.
8. Stanek, K., W.R. Murphy, T.G. Coleman.
"Hemodynamic patterns in two kidney one clip Goldblatt hypertensive conscious rats." *The Physiologist*. 26 (4): A-47, 1983. Abstract
9. Smith, T.L., T.G. Coleman, W.R. Murphy, K. Stanek.
"Hemodynamic correlation's in unanesthetized rats." *The Physiologist*. 26 (4) A-100, 1983.
10. Stanek, K., J.J. Neal, W.B. Sawyer, A.D. Loewy.
"Changes in regional blood flow and cardiac output after L-glutamate stimulation of the A5 catecholamine cell group." *Fed. Proc.* 42.1121, 1983. Abstract
11. Coleman, T.G., T.L. Smith, K. Stanek, W.R. Murphy, R.A. Norman, Jr., A.C. Dent.
"Hemodynamics in the conscious rat." *Experimental and Genetic Models of Hypertension, Handbook of Hypertension, III*. Elsevier Biomedical Press, Amsterdam.
12. Stanek, K., T.L. Smith, W.R. Murphy, and T.G. Coleman.
"Simultaneous measurements of tail cuff and intra-arterial pressures (IAP) in two kidney, one clip (2K-1C) hypertensive rats before and after Catopril." *The Physiologist*. 25 (4) :328, 1982. Abstract
13. Stanek, K., T.L. Smith, W.R. Murphy, T.G. Coleman.
"Regional blood flows and resistance in Wistar-Kyoto (WKY) and spontaneously hypertensive rats (SHR)." *Fed. Proc.* 41.1662, 1982. Abstract.
14. Smith, T.L., T.G. Coleman, W.R. Murphy, K. Stanek.
"Techniques for twenty-four hours hemodynamic monitoring in unanesthetized rats." In: *Proc. First Southern Biomed. Eng. Conf.* S. Saha Ed. Pergamon Press, New York, 1982.
15. Smith, T.L., T.G. Coleman, W.R. Murphy, K. Stanek.
"Continuous hemodynamic monitoring in unanesthetized rats." *Fed. Proc.* 41.1351, 1982.

16. Murphy, W.R., K. Stanek, T.G. Coleman, T.L. Smith.
"Measurement of renal artery pressure in the rat." Clinical & Experimental Hypertension A4 (8) :1351-1358, 1982.
17. Coleman, T.G., W.R. Murphy, K. Stanek.
"The role of the kidney in blood pressure regulation." Pathophysiology and Treatment Ed. Amery. Martinus Nijhoff, The Hague, pp. 3-17, 1982.
18. Smith, T.L., T.G. Coleman, W.R. Murphy, K. Stanek.
"Twenty-four-hour hemodynamic monitoring in unanesthetized rats."
Biomaterials, Medical Devices and Artificial Organs. 9:276-278, 1981.

PUBLICATIONS CONTINUED

19. Stanek, K., T.G. Coleman, W.R. Murphy, T.L. Smith.
"Chronic arterial catheters in the rat." Fed. Proc. 40 (3) 525, 1981. Abstract.
20. Murphy, W.R., T.G. Coleman, K. Stanek, T.L., Smith.
"Effect of clip size on blood pressure and renal artery pressure in Goldblatt hypertension." Fed. Proc. 40 (3) 529, 1981.
21. Stanek, K., T.G. Coleman, T.L. Smith, W.R. Murphy.
"A microsphere technique for flow studies in conscious rats." Fed. Proc. 39 (3):708, 1980. Abstract.
22. Coleman, T.G., W.R. Murphy, R.D. Samar, T.L. Smith, K. Stanek.
"Arterial pressure during hemorrhage: Effect of prior sodium deprivation." Miss. Acad. Sci. 15 (Suppl.) :64, 1980.
23. Coleman, T.G., W.R. Murphy, R.D. Samar, T.L. Smith, K. Stanek.
"Arterial pressure during hemorrhage: Effects of anesthesia increases in plasma renin activity and recruitment of extravascular fluid." Journal of Mississippi Academy of Science. 15 (Suppl.):65, 1980.
24. Murphy, W.R., A.G. Graves, K. Stanek, T.G. Coleman.
"Development of an aortic coarctation model." Journal of Mississippi Academy of Science. 24 (Suppl.):79, 1979.
25. Stanek, K., F.J. Nagle, G.E. Bisgard, W.C. Byrnes.
"Effect of hyperoxia on oxygen consumption in exercising ponies." Journal of Applied Physiology, Respiration, Environment, Exercise Physiology. 46 (6):1115-1118, 1979.
26. Bisgard, G.E., H.V. Forster, B. Byrnes, K. Stanek, J. Klein, M. Manohar.
"Cerebrospinal fluid acid-base balance during muscular exercise." Journal of Applied Physiology: Respiration, Environment, Exercise Physiology 45 (1):94-101, 1978.
27. Stanek, K., F.J. Nagle, G.E. Bisgard, B. Byrnes, M. Manohar.
"Exercise metabolic effects of hypoxia in ponies."
Fed. Proc. 37 (3), March 1978.
28. Bisgard, G.E., H.V. Forster, B. Byrnes, K. Stanek, J. Klein, M. Manohar.
"Cerebrospinal fluid (CSF) and plasma acid-base during exercise."

Fed. Proc. 36 (3), March, 1977.

29. Manohar, M., G.E. Bisgard, B. Byrnes, K. Stanek, M.V. Forster.
"Effect of Beta-adrenergic blockade on the cardiac response to submaximal exercise in ponies." Presented at the 57th Conference of Research Workers.

REFERENCES

Upon Request.

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6317 S. Dearborn Rd
Spokane, Wa 99223

fax 509-991-2056
telephone 509-991-2056

Experience with Dysport

I opened my private practice in 1996 and shortly thereafter began working with neurotoxins. Training was provided by the manufacturer of the different neurotoxins. At that time very few muscles were approved for injections, but insurances paid for treatment of spastic muscles off-label , as long as prior authorizations wa obtained.

I have used Dysport for many years and have used a dilution of 2.5cc of saline to dilute a 500 unit vial of Dysport. This gives me a ratio of 20 units of Neurotoxin per 0.1cc of liquid. In my experience, patients do better using 0.2cc to 0.3 cc per injection versus larger volumes. I find that by spreading it throughout the spastic muscle versus giving it all in one spot provides for better spasticity relief.

I enjoy teaching anatomy and the functions of the muscles involved. I will be happy to discuss my experiences using Dysport with you in the future. Thank-you for considering me for this unique position.



Michael K. Turner, M.D., FAAPMR
Board-certified, Physical Medicine & Rehabilitation
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Richland WA 99352
(Phone) 509-349-3010 (Fax) 509-769-0944
web: michaelturnermd.com
email: michaelturnermd@outlook.com

MISSION

Creating an experience of God's love through exceptional healthcare.

EDUCATION

The Mayo Clinic Residency, Department of Physical Medicine and Rehabilitation	Rochester, MN
The Mayo Clinic Internship, Department of Internal Medicine	Rochester, MN
Harvard Medical School M.D., Class of 2005	Boston, MA
Stanford University B.A., Human Biology, Class of 1997	Stanford, CA

BOARD CERTIFICATIONS

American Board of Physical Medicine and Rehabilitation, 95% percentile oral examination score.
United States Medical Licensing Examination: Parts 1, 2, and 3

MEDICAL LICENSURE

Washington (2009-)
Washington Department of Labor and Industries Approved Provider
Minnesota (2005-2009)
Florida (2008-2009)
Arizona (2008-2009)

PROFESSIONAL SOCIETIES

American Academy of Physical Medicine and Rehabilitation
American Association of Orthopaedic Medicine
American Academy of Anti-Aging Medicine
Washington State Medical Association
Benton-Franklin County Medical Society
Mayo Clinic Alumni Association
Harvard Alumni Association
Stanford Alumni Association
Christian Medical and Dental Association

PROFESSIONAL APPOINTMENTS

Staff Physician, Kadlec Neuroscience Center, 2009-2020

HONORS/AWARDS

Mayo Department of Physical Medicine and Rehabilitation, Outstanding Senior Resident Research Award
Winner of the G. Keith Stillwell memorial award for excellence in research.

Mayo International Health Program Scholarship
Competitive scholarship providing funding for one month of international work.
Worked in an outpatient rehabilitation center in the Dominican Republic.

Harvard Medical School, \$9,000 Research Grant, Office of Enrichment Programs,
Competitive grant used to conduct a year-long medical education research project.

Stanford University, \$2,000 Research Grant, Office of Undergraduate Research Opportunities
Competitive grant used to conduct a project relating to street children in the Dominican Republic.

Stanford University, President's Award for Academic Excellence
One of only 50 students selected from a class of 1600 to be recognized for outstanding academic achievement during the freshman year of college.

PUBLICATIONS

Prevalence and Clinical Correlates of Vitamin D Inadequacy Among Patients with Chronic Pain
Turner M.K., Hooten W. M., Schmidt J.E., Kerkvliet J.L., Townsend C.O., Bruce B.K.
Pain Medicine, 8:979-984, 2008

Web-Based Learning Versus Standardized Patients For Teaching Clinical Diagnosis: A Randomized, Controlled, Crossover Trial
Turner, M.K., Simon, S., Facemyer, K.C., Newhall, L.M., & Veach, T.L.
Teaching and Learning in Medicine, 18:208-214, 2006

Brainchip for Biochemistry: a USMLE step 1 review
Turner M.K., Lee S. ISBN 0-632-04636-8, 2002 Blackwell Science

PRESENTED PAPERS, PRESENTATIONS, WORKSHOPS, CONFERENCES, AND SYMPOSIA

Corporate Wellness Initiative
11 week program for faculty and staff, Educational Service District Pasco WA, 2017

Achieving Optimal Wellness
Oasis Physical Therapy, community education event, 2014

Living with Chronic Pain
Kadlec Neurologic Resource Center, community education event, 2013

Mayo Clinic Hand Seminar
National Meeting of the American Academy of Physical Medicine and Rehabilitation, 2012

Mayo Clinic Hand Seminar
National Meeting of the American Academy of Physical Medicine and Rehabilitation, 2011

Problem-Focused Physical Examination of the Neck and Low Back
Kadlec Neuroscience Center, regional CME presentation for primary care providers, May 2010

Understanding Low Back Pain and Sciatica
Oasis Physical Therapy, educational presentation for therapists and the general public, Pasco WA, January 26, 2010

Vitamin D: Physiology and Implications for Clinical and Laboratory Medicine
Grand Rounds, The Mayo Clinic Department of Laboratory Medicine and Pathology, May 20, 2009

Strategies to Reliably Achieve Partial Weight-Bearing
Grand Rounds, The Mayo Clinic Department of PM&R, July 20, 2007

The Relevance of Vitamin D Status for Clinical PM&R Practice
Grand Rounds, The Mayo Clinic Department of PM&R, May 11, 2007

Vitamin D Deficiency and Opioid Usage Among Chronic Pain Patients

Turner M.K., Hooten W. M., Schmidt J.E., Kerkvliet J.L., Townsend C.O., Bruce B.K.
The Association of Academic Physiatrists Annual Conference, San Juan, Puerto Rico, April 14, 2007

Comparison of Two Formats for Teaching Clinical Diagnosis to Medical Students: Standardized Patient Versus Computer Case Presentations

Turner, M. K., Newhall, L., Dudding, B., Veach T. L., & Facemyer, K. C.
The Annual AAMC Generalist in Medical Education Conference, Washington DC, November 9, 2003

Evaluation of Standardized Patients and the Diagnostic Reasoning (DxR) Case Simulator in Teaching Diagnostic Reasoning Skills to Second Year Medical Students

Turner, M. K., Facemyer, K. C., & Veach T.L.
The American Evaluation Association Annual Conference, Sparks, Nevada, November 5, 2003

RESEARCH EXPERIENCE

Vitamin D Deficiency and Opioid Usage Among Chronic Pain Patients, Mayo Clinic

Initiated a research project aimed at quantifying the prevalence of Vitamin D deficiency and its correlation with opioid usage and other relevant variables, among patients referred for multidisciplinary pain rehabilitation. Manuscript published in *Pain Medicine*.

Teaching Clinical Skills to Medical Students, University of Nevada School of Medicine

Designed and administered a year-long medical education research project comparing the efficacy of a computer-based program versus a standardized patient to teach diagnostic reasoning skills. Outcome measures were ability to influence final exam scores, cost, and student affinity. Supported by research grants from Harvard Medical School and the University of Nevada School of Medicine.

CAREER DEVELOPMENT

- 2019 *American Academy of Anti-Aging Medicine*, Las Vegas NV
- 2019 *Endocrine and Neurotransmitter Symposium*, Labrix, Portland OR
- 2018 *Functional Regenerative Medicine*, Boston Biolife, Scottsdale AZ
- 2016 *American Association of Orthopaedic Medicine Annual Conference*, Clearwater FL
- 2015 *American Association of Orthopaedic Medicine Annual Conference*, New Orleans LA
- 2015 *American Academy of Anti-Aging Medicine*, Fort Lauderdale FL
- 2014 *American Association of Orthopaedic Medicine Annual Conference*, Clearwater FL
- 2012 *American Academy of Physical Medicine and Rehabilitation Annual Conference*, Atlanta GA
- 2011 *American Academy of Physical Medicine and Rehabilitation Annual Conference*, Orlando FL
- 2010 *American Academy of Physical Medicine and Rehabilitation Annual Conference*, Seattle WA
- 2009 *North American Spine Society Annual Conference*, San Francisco CA
- 2008 *Hands-on Musculoskeletal Ultrasound: Diagnostic and Interventional Techniques*, 3 day CME, American Institute of Ultrasound in Medicine
- 2008 *Fundamentals of Musculoskeletal Ultrasound*, 7 day CME Course, University of Michigan
- 2007 *Botulinum Toxin*, CME Course, University of Michigan
- 2007 Teaching Assistant, Mayo Medical School, Year 1 Musculoskeletal Physical Exam Skills course
- 2007 *Symposium: ImPACT Concussion Management Program*
- 2006 Teaching Assistant, Mayo Medical School, Year 1 Musculoskeletal Physical Exam Skills course
- 2006 Pre-participation physical examinations for area high-school athletes
- 2006 *Spine Pain*: Mayo Health System Regional Rehabilitation Conference
- 2006 Team Physician, John Marshall High School football

LEADERSHIP

- 2020 Board Member, Grace Kitchen
- 2014 Founder and CEO, Aspire Enterprises Inc.

- 2013-14 Board Member, Kadlec Neurologic Resource Center
2012 Organized a continuing education conference for local physical therapists
2010 Organized the multidisciplinary Neuroscience Case Conference Series
2010 Physician Leader of the Planetree Committee, Kadlec Neuroscience Center
2009 Proposed and facilitated integration of the computer systems between Kadlec physical therapy and the Kadlec Neuroscience Center
2008 Project Leader for a yearly resident triathlon fundraiser to benefit a local charity. Raised over \$3,000
2008 Developed a patient education handout used by the Cardiovascular Health Clinic (“Guidelines for Healthy Eating”)
2008 Researched appropriate outcome measures for foot pain patients at the Sports Medicine Center. These have now been incorporated to quantify pre and post-injection pain and disability levels.
2007 Initiated the “Resident Appreciation Award”, a yearly mechanism to honor faculty and staff for support of residents
2007 Elected to be the class representative on the Mayo PM&R Residency Education Committee
2006 Developed the evidence-based protocol used for the assessment and repletion of Vitamin D levels of all patients entering the Mayo Pain Rehabilitation Program
2000-05 Elected medical school class representative to the Harvard University Health Services Advisory Committee

WORK EXPERIENCE

Emergency Room and Urgent Care Physician Southeast MN

Overnight and weekend shifts.

Albert Lea Medical Center, Winona Health, Apple Valley Medical Center, 2007-09

SAT and MCAT Instructor Boston, MA

Instructor for weekly SAT and MCAT test preparation classes.

Kaplan Educational Services, 2001-2002

Academic Tutor Boston, MA

Started a business during first and second year of medical school that provided personalized tutoring to local high school students. Areas of specialty were math, science, and Spanish.

Ivy League Tutorial Services, 2000-2002

Middle School Math and Science Teacher Atherton, CA

Responsible for teaching concepts from biology, chemistry and physics to seventh and eighth graders, and for teaching algebra to eighth graders. Responsible for over one hundred students.

St. Joseph's School, 1998-99

Fifth Grade Classroom Teacher Fresno, CA

Full-time position as a fifth grade instructor for a class of 35 students. Position also required the development and teaching of a General Science curriculum to all three fifth grade classes (total of 115 students).
Valley Oak Elementary School, 1997-98

SPECIAL SKILLS

Fluent in Spanish.

Lived and worked extensively in Latin America

PERSONAL

Married with eight children

Brown Belt in Judo

Enjoys basketball, weight training and yoga